

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION**

DARRYL ANDERSON, et. al.,

Plaintiffs,

v.

PERDUE FARMS. INC.,

Defendant.

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**CIVIL ACTION NO.
1:06-cv-01000-MEF-WC**

**NOTICE OF FILING ADDITIONAL
NOTICES OF CONSENT TO JOIN**

Plaintiffs give notice of filing the attached Notices of Consent to Join executed by RAY C. SMITH, MARY BRYANT, MARILYN BATTLE, TOMIKA DAWKINS, and ELEANOR ELANE VICKERS, similarly situated employees to Plaintiffs who likewise are or were subjected to the illegal pay practices at issue and who wish to join the above-captioned lawsuit.

Dated: April 16, 2007

Respectfully submitted,

THE COCHRAN FIRM, P.C.

/s/ Robert J. Camp

ROBERT J. CAMP

BERNARD D. NOMBERG
505 North 20th Street, Suite 825
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(205) 930-6900 (Phone)
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– and –

Samuel A. Cherry, Jr.
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– and –

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284 South University Drive
Fort Lauderdale, FL 33324
(954) 318-0268 (Phone)
(954) 333-3515 (Fax)

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2007, I electronically filed the foregoing Notice of Filing Additional Notices of Consent to Join with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to:

Sandra B. Reiss
sandra.reiss@odnss.com

Lance Harrison Swanner
lswanner@cochranfirm.com

James J. Kelley
jkelly@morganlewis.com

Bernard D. Nomberg
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Samuel A. Cherry, Jr.
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/s/ Robert J. Camp
ROBERT J. CAMP

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Ray C Smith states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan AL. I worked at this location from
[City/State]
3-27-97 to 4-19-06.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 15 day of March, 2007.

Ray C. Smith
[PRINT NAME]

Ray C. Smith
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Mary Bryant states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue farms at
[Name of plant]
the facility located in Dothan, AL. I worked at this location from
[City/State]
8-8-89 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue farms plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 18 day of March, 2007.

Mary Bryant
[PRINT NAME]

Mary Bryant
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Marilyn Battle states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of Plant]
the facility located in Dothan Alabama I worked at this location from
[City/State]
08/30/04 to Present.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre-and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan Alabama and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13th day of February, 2007.

Marilyn Battle
[PRINT NAME]

Marilyn Battle
[SIGN NAME]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Tomika Dawkins states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms at
[Name of plant]
the facility located in Dothan, AL I worked at this location from
[City/State]
Aug 15 1998 to Dec 11 2004
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms plant in Dothan, AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 28 day of March, 2007.

Tomika Dawkins
[PRINT NAME]

Tomika Dawkins
[SIGNATURE]

CONSENT TO JOIN SUIT AS PARTY PLAINTIFF

TO: CLERK OF THE COURT AND COUNSEL OF RECORD

Eleanor Elane Vickers states the following:
[Print Name]

1. I am over 18 years of age and competent to give the following consent in this matter.
2. I am currently, or was formerly employed, by Perdue Farms Inc. at
[Name of plant]
the facility located in Dothan AL. I worked at this location from
[City/State]
11/12/1986 to 6/30/2006.
[Date] [Date, or if still working write "present"]
3. I understand that this suit is being brought to recover compensation for pre- and post-production time activities from my employer. I also understand that the lawsuit may seek recovery for unpaid production time. I understand that the suit is brought pursuant to both federal law and applicable state statutes, if any.
4. I believe I have not been paid for all compensable time, which I have worked, including overtime.
5. I hereby consent and agree to be a plaintiff herein and to be bound by any settlement of the case or adjudication by the Court.
6. I understand that this suit may be brought as a class action covering employees at the Perdue Farms Inc. plant in Dothan AL, and
[Name of Plant] [City/State]
possibly other plants owned by Perdue Farms Inc.. If brought as a class
[Name of Plant]
action under either federal or state law, I agree to be a named Plaintiff in such class.

I swear or affirm that the foregoing statements are true to the best of my knowledge.

DATED the 13 day of March, 2007.

Eleanor Elane Vickers
[PRINT NAME]

Eleanor Elane Vickers
[SIGN NAME]